

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BOARD OF TRUSTEES OF THE LOCAL)
UNION NO. 422 U.A. OF JOLIET,)
ILLINOIS PENSION FUND AND)
BOARD OF TRUSTEES OF THE LOCAL)
UNION NO. 422 U.A. OF JOLIET,) No. 07 C 6874
ILLINOIS WELFARE FUND,)
Plaintiffs,) Judge Lefkow
v.)
) Magistrate Judge Cole
RNR Leasing, Inc., R and R Leasing, Inc.,)
and Royanne Reddy, Individually,)
Defendants.)

MOTION FOR ORDER OF DEFAULT AND JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ and ARNOLD AND KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order of Default as to liability and Judgment in favor of Plaintiffs and against Defendants, RNR Leasing, Inc., R and R Leasing, Inc., and Royanne Reddy, Individually.

In support thereof, Plaintiffs state:

1. This case was filed on December 6, 2007.
2. Defendants were served with Summons and Complaint on January 10, 2008.
3. In excess of 20 days have expired since Service of Process, however, Defendants have failed to file an answer or otherwise plead.
4. Per the affidavit of Olga Kane, Defendant signed the note that is now in default as follows: \$6,847.87 is due for NSF check payment for fringe benefit contributions plus interest on same. (Exhibit A)

5. Per the affidavit of Donald Schwartz, attorney for Plaintiffs in legal fees and expenses \$1,200.00 has been incurred in this suit. (Exhibit B)

WHEREFORE, Plaintiffs pray for:

1. An Order of Default against the Defendant.
2. Judgment be rendered in the amount of \$8,047.87.

Respectfully submitted,

BOARD OF TRUSTEES OF THE LOCAL
UNION NO. 422, U.A. OF JOLIET, ILLINOIS
PENSION FUND, et. al.

s/ Donald D. Schwartz
Counsel for Plaintiffs

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